



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

EPA Region 5 Records Ctr.



230070

February 9, 2005

REPLY TO THE ATTENTION OF: SE-5J

VIA FACSIMILE AND U.S. MAIL

Mr. Steven C. Kornder, Ph.D.
STS Consultants, Ltd.
750 Corporate Woods Parkway
Vernon Hills, IL 60061-3153

RE: Completion of On-Site Work for the Lindsay Light II Site-Family Golf Course/Lakeshore East, 221 North Columbus Drive, RV5

Dear Mr. Kornder:

On July 17, 2002, U.S. EPA issued an Action Memorandum which documented U.S. EPA's determination that radioactive materials present at the Family Golf Course/Lakeshore East Site, located at 221 North Columbus Drive, Chicago, Illinois (Site) posed an imminent and substantial threat to public health and the environment and explained the need for a time critical removal action based on the impending development of the Site. For the purposes of this Notice of Completion, "on-site" is defined as the real property identified as Cook County's Assessor's Permanent Index Numbers: 17-10-318-040; 17-10-318-041; 17-10-318-042; 17-10-318-054; 17-10-318-043; 17-10-318-044; 17-10-318-045; 17-10-318-046; 17-10-318-047; 17-10-318-048; 17-10-400-019; 17-10-400-020; 17-10-400-021; 17-10-400-022; 17-10-400-023; 17-10-400-024; 17-10-400-025; 17-10-400-026; 17-10-318-049; 17-10-318-051; 17-10-318-052; 17-10-318-053; 17-10-400-027; 17-10-400-028; 17-10-318-050; 17-10-319-001; 17-10-319-001; and 17-10-319-002, that is bounded on the north by East Wacker Drive, to the east of Lake Shore Drive, to the south by high rise buildings and East Randolph Street, and to the west by North Columbus Drive and commercial buildings. The owners of the Site, Lakeshore East, LLC, Lakeshore Links, LLC, Lakeshore East Parcel P, LLC, and Lakeshore East Development Group, Ltd., conducted a removal action in accordance with a Work Plan for Investigation and Removal of Radiologically Impacted Soil, Lakeshore East, LLC, dated June 24, 2002, revised September 13, 2002, final revision dated September 30, 2002, and approved by U.S. EPA on correspondence dated October 15, 2002 (Work Plan). Please note that in section 1.2 of the Completion Report dated September 19, 2003 and in section 1.1 of the Completion Report Addendum dated September 23, 2004, the date stated for U.S. EPA approval of the Work Plan is not correct. Both documents state that the Work Plan was approved by U.S. EPA in correspondence dated September 30, 2002. Please correct these dates to October 15, 2002.

This Completion Letter covers only the on-site portion of the Site. This Completion Letter concludes that upon receipt of the bound final report which incorporates all editorial changes

requested in a separate letter dated November 2, 2004 as well as the Work Plan approval date correction, that all on-site work required will be complete and no further on-site removal activities are necessary except for activities that are required as described below which will be incorporated into the amended Declaration of Covenants, Restrictions and Easements for Lakeshore East and will be recorded with the Recorder of Deeds, Cook County, Illinois (Declaration). Any time the owner of the Site, their contractor, representative or agent plans to disturb, expose or intrude into the soils in the former Boat Slips depicted on Exhibit A, enclosed, (Reference Map of Site dated May 6, 2003, entitled Locations of Former Slips, Lakeshore East LLC, 221 North Columbus Drive, Chicago, Illinois -Fall 2002), below eighteen (18) inches from the highest contour point in the former Boat Slip areas [6 feet Chicago City Datum (CCD)-585.48 Mean Sea Level (MSL)] depicted on Exhibit B, enclosed, (Reference Map of Site dated May 19, 2003, entitled Radiological Survey Showing 18 inch Lifts, Down Hole Borings, Areas Not Covered By Walkover Survey, Subdivided Parcels, and Former Boat Slip Locations, Lakeshore East LLC, 221 N. Columbus Drive, Chicago, Illinois), the owner shall notify U.S. EPA both by telephone and in writing of plans to work in the former Boat Slips forty-eight (48) hours prior to commencing such activities. Additionally, anytime soils below eighteen (18) inches from the highest contour point in the Boat Slip [6 feet CCD-585.48 MSL] depicted on Exhibits A and B are disturbed, exposed or intruded upon in the former Boat Slips, the owner, their contractor, representative, and agent must do so in accordance with the Work Plan.

If material containing total radium in excess of 7.1 pCi/gram are identified onsite, the owner shall submit monthly status reports to U.S. EPA until the contamination is remediated. In addition, an addendum to the Completion Report must be issued by December 31 of that year to reflect remediation activities of the prior fiscal year (October 1 - September 30). The purpose of recording the Declaration with the Recorder of Deeds is to notify the public and subsequent owners of the Site of restrictions at the Site and the requirement to conduct any intrusive work in accordance with the Work Plan.

Note that certain property adjacent to the Site, specifically, Parcels O and P which are located adjacent in an easterly direction to North Columbus Drive are owned by other parties and have not been fully investigated or remediated to date. Additionally, during the course of the removal activities LSE identified material containing total radium in excess of 7.1 pCi/gram under the Harbor Drive Sidewalk which is owned by the City of Chicago. The Harbor Drive Sidewalk is located in City of Chicago right-of-way (west side of Harbor Drive) just off the southeast portion of the Site. If the owner of the Site, their contractor, representative or agent conducts work in the Harbor Drive sidewalk, the owner shall notify U.S. EPA and the City of Chicago of their plans to work in the Harbor Drive sidewalk area, forty-eight (48) hours prior to disturbing, exposing or intruding upon the Harbor Drive sidewalk or the soils beneath the Harbor Drive sidewalk. Additionally, anytime the owner of the Site, their contractor, representative or agent disturbs, exposes or intrudes upon the Harbor Drive sidewalk itself or the soils beneath the Harbor Drive sidewalk, the owner of the Site, their contractor, representative and agent must do so in accordance with the Work Plan.

The July 17, 2002 Action Memorandum sets forth the work to be completed:

- 1) Develop a Work Plan for the radiological assessment of the Site.
- 2) Develop a Quality Assurance Plan.
- 3) Develop and implement a radiological site health and safety plan.
- 4) Conduct land surveying to the extent necessary to establish a grid system to locate all property boundaries, special features (pipes, storage tanks, etc.), and sample locations.
- 5) Place borings in critical locations (grid corners, high exposure rate areas, special features, etc.). For the purpose of measuring subsurface radiation levels. Measurements shall be recorded at each 6 inch depth until the natural soils are reached or radiation levels reach background, whichever is the greatest depth.
- 6) Collect soil samples from the borings and analyze for radionuclide content and RCRA characteristics. These results will then be used by the PRP or buyer to correlate subsurface radiation levels and radionuclide content.
- 7) Conduct off-site surveying and sampling as necessary and, at a minimum, implement 40 CFR 192, if deemed necessary should extensive contamination be discovered beyond current site boundaries.
- 8) Based upon soil results, remove, transport and dispose of all characterized or identified hazardous substances, pollutants, wastes or contaminants at a RCRA/CERCLA approved disposal facility in accordance with the U.S. EPA off-site rule.

In total, 4639.8 tons of thorium impacted soil were shipped to Envirocare in Clive, Utah. On September 19, 2003, STS Consultants Ltd. submitted a draft report on their activities at the Site, as required by the Work Plan. In addition, Addendum I to the report was submitted on September 23, 2004.

U.S. EPA's Superfund Division performed oversight of the PRP's activities at this Site. Additionally, the Superfund Division reviewed the STS Consultants, Ltd. Lakeshore East Completion Report and Addendum.

This notice of completion in no way releases Lakeshore East LLC, Lakeshore Links, LLC, Lakeshore East Parcel P, LLC, and Lakeshore East Development Group, Ltd. from any potential future obligations to perform additional work to address the same or other conditions at the Site. Similarly, this notice of completion does not release Lakeshore East LLC, Lakeshore Links, LLC, Lakeshore East Parcel P, LLC, and Lakeshore East Development Group, Ltd. from any recordkeeping or other obligations.

Please contact me at (312) 886-5123 or Cathleen Martwick, Associate Regional Counsel at (312) 886-7166, if you have any questions concerning this letter.

Sincerely,

A handwritten signature in black ink that reads "Fredrick A. Micke". The script is cursive and fluid.

Fredrick A. Micke, P.E.
On-Scene Coordinator, ERB #3

Enclosures

cc: David J. Carlins, Magellan Dev. Group w/o Enclosures

bcc: Charles Gebien, SE-5J
Verneta Simon, SE-5J
Debbie Regel, SE-5J
Cathy Martwick, SE-5J
Mary Fulghum, C-14J



- LEGEND:**
- SOIL BORING GAMMA LOGGED (12 FT DEEP UNLESS ALTERNATE DEPTH IN PARENTHESES)
 - WHITE AREAS WITHIN PROPERTY BOUNDARY CONTAIN 18 INCHES OR LESS OF POST 1900 FILL. THUS, LIFT SURVEYS WERE NOT REQUIRED.
 - SURFACE GAMMA SURVEY TO BE COMPLETED (AREA NOT COVERED IN STS REPORT OF SEPTEMBER 2001 SINCE AREA WAS COVERED BY WATER).
 - GAMMA SURVEYS OF POST-1900 FILL IN 18 IN. LIFTS TO BE COMPLETED.
 - 18 IN. LIFT GAMMA SURVEYS COMPLETED IN LIGHT GRAY AREAS.
 - 18 IN. LIFT GAMMA SURVEYS REQUIRED FOR EXCAVATION EXTENDING INTO HISTORICAL FILL.
 - PREGRADE SITE TOPOGRAPHY 0-FOOT CONTOUR REFLECTS 6.0 FT. CITY OF CHICAGO DATUM (CDD) OR APPROXIMATELY PRE-1900 FILL GROUND ELEVATION (CONTOUR INTERVAL 0.5-FOOT).
 - EXISTING STRUCTURE.

30 SITE-WIDE GAMMA SURVEY GRID NETWORK

SITE CONSTRUCTION COORDINATES

SLIP BOUNDARY
PROPERTY LINE



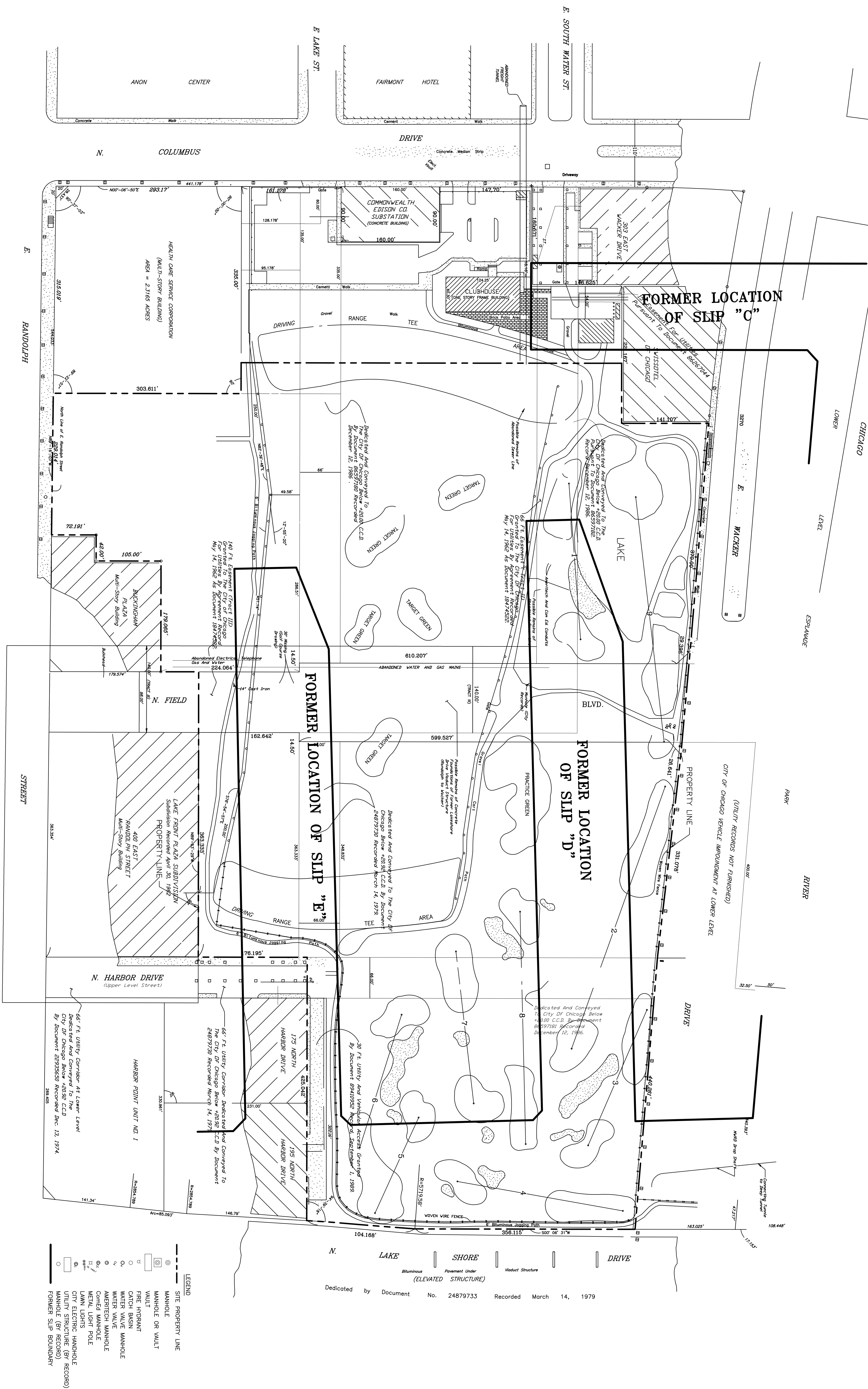
STS Consulting Engineers Ltd.

RADIOLOGICAL SURVEY SHOWING 18 INCH LIFTS, DOWN HOLE BORINGS, AREAS NOT COVERED BY WALKOVER SURVEY, SUBDIVIDED PARCELS, AND FORMER SLIP LOCATIONS
LAKESHORE EAST LLC
221 N. COLUMBUS DRIVE
CHICAGO, ILLINOIS

DRAWN BY	PVP	DATE	5/19/03
CHECKED BY	SCK	DATE	5/19/03
APPROVED BY	RGB	DATE	5/19/03
CADFILE	X:\PROJECTS\132193XC\REPORT\G132193XC-1.dwg		

REVISION NO.	DESCRIPTION	DATE	BY

STS PROJECT NUMBER	32193-XC
STS PROJECT FILE	G132193XC-1.dwg
SCALE	1"=60'
SHEET NUMBER	1



- ALL COORDINATES ARE WITH REFERENCE TO THE COORDINATE SYSTEM AS ESTABLISHED BY THE BUREAU OF ENGINEERING OF THE CITY OF CHICAGO. ALL DISTANCES ARE IN FEET AND DECIMALS THEREOF. A PERIOD OF SECONDS WEST FOR THE NORTH END OF EAST RANDOLPH STREET AND A COORDINATE VALUE OF 18442.607 FEET NORTH AND 19020.095 FEET EAST AT THE NORTHWEST CORNER OF EAST RANDOLPH STREET AND NORTH MICHIGAN AVENUE.
- ELEVATIONS SHOWN HEREON ARE WITH RESPECT TO CHICAGO DATUM.

[illegible]

LOCATIONS OF FORMER SLIPS
LAKE SHORE EAST LLC
221 NORTH COLUMBUS DRIVE
CHICAGO, ILLINOIS – FALL 2002